

REMARKS

This Request for Reconsideration is filed in response to the final Office Action of January 6, 2009 in which claims 1-33 were rejected. The former obviousness rejections were revised based on additional prior art.

Claims 1-31 are now rejected under 35 U.S.C. § 103(a) as being unpatentable over *Friesen* in view of *Tendler* and further in view of *Hwangbo*.

However, the Applicants consider that claim 1 is not obvious for at least the following reasons.

Firstly, the Examiner considers that it would have been obvious to modify *Friesen* in view of *Tendler* and, thus, arrive at a device comprising an interface adapted to receive a signal carrying a digital broadcast received via an antenna and a loop or coil configured to couple inductively with a corresponding loop or coil included in the mobile terminal so as to transmit the signal to the mobile terminal.

However, the Applicants disagree.

In particular, the Applicants consider that the *Friesen* and *Tendler* references do not teach using inductive coupling for conveying a GPS signal, as suggested by the Examiner.

*Friesen* described in column 4, lines 31-41:

“The cradle 2 is coupled by a coaxial cable 4 to a booster amplifier 6. The booster amplifier 6 is coupled by a second coaxial cable 8 to an antenna 10 .... The booster amplifier 6 is designed to ... work with virtually any commercial cellular network. Various cradles 2 may be used with this system. The cradle may have a direct RF connection to the handset or it may be inductively coupled.”

In other words, *Friesen* describes that, for cellular communication, a cradle and a handset may be inductively coupled.

*Tendler* describes in paragraphs [0025] and [0026]:

“A cellular phone 10 within a vehicle 12 includes an internal GPS antenna 14 coupled to a GPS receiver 16 ... cellular phone 10 is carried within a handsfree cradle 20 ... to which is coupled ... a vehicle mounted cellular phone antenna 26. Also carried within handsfree cradle 20, is transfer antenna 28 in close proximity to

GPS antenna 14, with transfer antenna 28 coupled to an external active GPS antenna 30 ...”

In other words, *Tendler* describes separate cellular communication connections and separate GPS connections to a handset.

Therefore, even if it assumed (which the Applicants do not) that the skilled person would modify *Friesen* in view of *Tendler*, then they would modify the cellular communication connection and GPS connections separately.

Neither *Friesen* nor *Tendler* disclose using inductive coupling for a GPS connection.

Moreover, the person of ordinary skill in the art would not consider providing two sets of loops (one to connect cellular circuits to an external antenna and one to connect a GPS receiver to an external antenna) due to the foreseeable problem of crosstalk.

Therefore, the Applicants consider that the *Friesen* and *Tendler* references do not, either alone or together, teach using inductive coupling for conveying a GPS signal.

Secondly, the Examiner considers that it would have been obvious to incorporate the teachings of *Hwangbo* into the teachings of *Friesen* as modified by *Tendler*.

However, the Applicants disagree.

The Applicants consider that the skilled person would not consider modifying *Friesen* and *Tendler* in view of *Hwangbo* because *Hwangbo* is in a completely different field from the other two references.

As explained above, both *Friesen* and *Tendler* describe a cradle for a cellular handset.

In contrast, *Hwangbo* describes a set-top box including an RF transmitter for radio-transmitting digital broadcast data to many TVs (see paragraph [0023]).

Therefore, it is clear that *Hwangbo* is in a completely different field from *Friesen* and *Tendler*. There are no pointers in *Friesen* or *Tendler* to suggest that that the person of ordinary skill should consider modifying a cradle for a cellular handset for use in a vehicle to allow reception of digital (video) broadcasts. In fact, *Friesen* describes that the use of a cellular telephone handset while driving creates certain

risks, e.g., such use can distract the driver (see column 1, lines 17 to 19). Providing a video broadcast to a cradle which is positioned for use by the driver would certainly be distracting and so be unsafe.

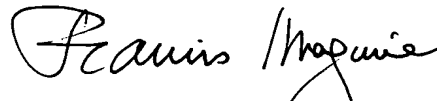
In summary, the Applicants consider that the person or ordinary skill in the art would not consider combining the references so as to arrive at the invention claimed in claim 1. The Applicants consider that the Examiner's rejection is based on a hindsight reconstruction of the invention in view of the Applicants' own disclosure.

Therefore, the Applicants consider that claim 1 is not obvious over the applied references.

Furthermore, the Applicants consider that claims 18 and 22 are not obvious for the same reasons as claim 1 and that claims 2 to 17, 19 to 21 and 23 to 33 are not obvious at least by way of dependency.

The objections and rejections of the final Office Action of January 6, 2009, having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of claims 1-33 to issue is earnestly solicited.

Respectfully submitted,



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